

BUTLER SNOW LLP

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Counsel for HCL America, Inc.

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

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|------------------------|---|-------------------------|
| ----- | | |
| In re: | § | Chapter 7 |
| | § | |
| GOODMAN NETWORKS, INC. | § | Case No. 22-31641 (MVL) |
| | § | |
| Debtor. | § | Re: Docket No. 1 |
| ----- | § | |

**HCL’S JOINDER TO THE
INVOLUNTARY PETITION AGAINST GOODMAN NETWORKS, INC.**

COME NOW HCL America, Inc. and HCL Technologies Corporate Service Limited (together “HCL”) and file this joinder to the involuntary petition against Goodman Networks, Inc. (the “Debtor”) filed by JLP Credit Opportunity Master Fund Ltd., JLP Credit Opportunity IDF Series Interests of the SALI Multi-Series Fund, L.P., JLP Institutional Credit Master Fund LP, and Alimco Re Ltd (collectively, the “Original Petitioning Creditors”) and joined by Arris Solutions,

Inc., and FedEx Supply Chain Logistics & Electronics, Inc.. HCL joins the involuntary petition pursuant to section 303(c) of title 11 (the “Bankruptcy Code”) and would show as follows:

1. On September 6, 2022, the Original Petitioning Creditors commenced the instant involuntary chapter 7 case by filing an *Involuntary Petition Against a Non-Individual* [Docket No. 1] as to the Debtor (the “Involuntary Petition”).

2. On October 17, 2022, FedEx Supply Chain Logistics & Electronics, Inc., filed its joinder to the Involuntary Petition. [Docket No. 29].

3. On November 7, 2022, the Court entered an order establishing procedures under Bankruptcy Rule 1003(b) to allow additional creditors to receive notice and join the Involuntary Petition. [Docket No. 53].

4. On November 9, 2022, the Debtor filed its Bankruptcy Rule 1003(b) creditor list and identified HCL as holding an undisputed claim against the Debtor in the amount of \$118,995.00 (the “HCL Claim”). [Docket No. 58-1].

5. On November 15, 2022, ARRIS Solutions, Inc., filed its joinder to the Involuntary Petition. [Docket No. 63].

6. On November 23, 2022, FedEx Freight, Inc. filed a joinder to the Involuntary Petition.

7. On December 5, 2022, Call Center Systems, LLC filed a joinder to the Involuntary Petition (.

8. On December 6, 2022, Frase Protection Inc. filed a joinder to the Involuntary Petition.

9. On December 6, 2022, Joseph Rexing Jr. and Leo Rexing (filed a joinder to the Involuntary Petition.

10. The Debtor is a Texas corporation with its principal place of business located at 2801 Network Blvd., Ste. 300, Frisco, Texas, 75034.

11. HCL is a California corporation with its principal place of business located at 330 Potrero Ave Sunnyvale, CA, 94085.

12. This Court has jurisdiction over this case under 28 U.S.C. § 1334 and 28 U.S.C. § 157(b)(1). Venue in this district is proper under 28 U.S.C. § 1408.

13. The HCL Claim is neither contingent as to liability nor subject to a bona fide dispute as to liability or amount and is based on providing of technology services. HCL is eligible to file this joinder under Section § 303(b) and (c) of the Bankruptcy Code.

14. The Debtor may be the subject of an involuntary case under Section 303(a) of the Bankruptcy Code because it is not paying its debts as they become due.

15. HCL in filing this joinder has relied in good faith on the representations of the Original Petitioning Creditors in the involuntary petition, their statements in support of the involuntary petition, and their waivers, including the representation that they are qualified creditors to commence an involuntary chapter 7 bankruptcy petition in accordance with section 303(b) of the Bankruptcy Code. *See* Docket Nos. 1–10.

WHEREFORE, HCL joins the involuntary petition and requests this Court (i) enter an order for relief against the Debtor in this case and (ii) provide such other relief as is just and appropriate under the circumstances of this case.

Dated: Friday, December 9, 2022

Declaration of Petitioner's Representative:

In accordance with 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Date: December 9, 2022

Signature: Aparna Jujjavarapu

Name: Aparna Jujjavarapu

Title: Authorized Signatory

Address: 330 Potrero Avenue, Sunnyvale, CA 94085

Respectfully submitted,

BUTLER SNOW LLP

/s/ Adam M. Langley

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Counsel for HCL America, Inc.

CERTIFICATE OF SERVICE

I, Candice M. Carson, certify that the foregoing pleading was filed electronically through the Court's ECF system and served electronically on all parties enlisted to receive service electronically in this case.

Dated: December 9, 2022

/s/ Candice M. Carson

CANDICE M. CARSON